

**brownrudnick**

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November 29, 2022

The Honorable Sarah L. Cave  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Room 1670  
New York, New York 10007

Plaintiffs' letter-motion seeking to file its privilege logs, list of exemplars, and second supplemental attorney affiliation list, under seal (ECF No. 538) is GRANTED, and the documents at ECF No. 539, 539-1 – 539-5 shall remain visible only to the selected parties.

The Clerk of Court is respectfully directed to close ECF No. 538.

SO ORDERED 11/30/22

  
SARAH L. CAVE  
United States Magistrate Judge

**RE: Monterey Bay Mil. Housing LLC v. Ambac Assurance Corp.**  
**Case No. 1:19 Civ. 09193 (PGG) (SLC)**

Dear Judge Cave:

Pursuant to the Court's November 14, 2022 order, the parties have met and conferred and agreed to jointly file 30 exemplars mutually agreed upon by the parties for in-camera review. Plaintiffs will submit the exemplar documents through the Court's file-share system per the Court's instructions. [Dkt. 523]. Both the Plaintiffs' Privilege Log and the list of the exemplar documents will be filed on the docket per the Court's order, however, due to the size and formatting of Plaintiffs' Privilege Log, the Plaintiffs will also submit an excel version of the Plaintiffs' log via the Court's file-share system. The Plaintiffs are also filing a copy of Plaintiffs' Second Supplemental Attorney Affiliation List to aid in the Court's review of the exemplars.

For the exemplar documents, the Plaintiffs are providing the full family of documents associated with each privilege log entry. For documents that were withheld, each page will be Bates stamped with the Privilege Log Entry number. For documents that were produced with redactions the exemplars will include transparent redactions, and each page will be Bates stamped with the production Bates numbers and the Privilege Log Entry number. For documents that were fully produced with no redactions but are a family member of a Privilege Log Entry document, each page will be Bates stamped with only the production Bates numbers.

Pursuant to Federal Rule of Civil Procedure 5.2(d), Rule I(G)(2) of Your Honor's Individual Practices, this Court's Standing Order No. 19-mc-583, and this Court's ECF Rules & Instructions (the "ECF Rules"), we write to request that the Court maintain the seal on Plaintiffs' Privilege Log and the Parties' list of exemplars filed today. Due to the privileged and confidential nature of these documents, Plaintiffs submit the Plaintiffs' Privilege Log and the list of exemplars under seal pursuant to Paragraph 12.4 of the Stipulated Protective Order in this case (ECF Nos. 135 and 425).

The Court's consideration is greatly appreciated.



Hon. Sarah L. Cave  
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Sincerely,

**BROWN RUDNICK LLP**

A handwritten signature in blue ink that reads "Lauren Tabaksblat".

Lauren Tabaksblat